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The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Juan Tacuri, et al.*,
22 Cr. 622 (AT)**

Dear Judge Torres:

The Government writes respectfully to request that this Court adjourn the pre-trial conference in this case currently scheduled for next Tuesday, January 16, 2024, and exclude time until the new pre-trial conference date under the Speedy Trial Act.

As the Court is aware, the parties are currently scheduled to appear on January 16, 2024, at 11:40 am for a status conference. The Government has produced a large amount of discovery in this case, which the defendants are reviewing, and the parties are all discussing the possibility of pretrial dispositions. Moreover, the Government expects to produce additional discovery shortly. The parties expect that, if they were to appear on January 16, 2024, they would ask the Court to schedule a status conference in approximately March 2024; the parties understand that the Court is available on March 26, 2024. Accordingly, in order to preserve the Court's resources and avoid unnecessary travel and expense (certain defendants and counsel are out-of-state), the parties believe that an adjournment of the status conference to March 26, 2024, or such other date as is convenient for the Court, would be appropriate.

Additionally, the Government respectfully requests that time be excluded up to and including the date of the adjourned pre-trial conference, pursuant to 18 U.S.C. § 3161(h)(7)(A), because, among other things, it will allow the defendants and their counsel to review discovery, determine what pre-trial motions, if any, to make and prepare such motions, prepare for trial, and engage in disposition discussions. Defense counsel consent to this request. A proposed order excluding time is attached.

Hon. Analisa Torres
January 11, 2024
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Please feel free to contact us with any questions or issues.

Respectfully submitted,

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By:



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GRANTED. The status conference scheduled for January 16, 2024, is ADJOURNED to **March 26, 2024, at 10:00 a.m.**

SO ORDERED.

Dated: January 11, 2024
New York, New York



ANALISA TORRES
United States District Judge